UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,	
Plaintiffs,	
vs.	No. 1:23-cv-00108-LMB-JFA
GOOGLE LLC,	
Defendant.	

DECLARATION OF ALI AMINI
IN SUPPORT OF DEFENDANT GOOGLE LLC'S
<u>MOTION TO SEAL CONFIDENTIAL DOCUMENTS AND TESTIMONY</u>

I, Ali Nasiri Amini, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Vice President of Engineering and Data Science at Google LLC. I have been employed by Google since July 2009. I submit this declaration in support of Google's Motion to Seal Confidential Documents and Testimony.

2. Based on my work at Google, I have personal knowledge of the company's practices and procedures for maintaining the confidentiality of its source code and other technical product information. The contents of this Declaration are true and correct to the best of my knowledge, information, and belief, and are based on Google's policies and practices as they relate to the treatment of confidential information, the materials that were provided to me and reviewed by me, and are informed by conversations with other knowledgeable employees of Google. If called upon as a witness in this action, I could and would testify competently thereto.

3. Google follows a strict practice that requires confidential treatment of its source code, product design information, and data. In my experience and to the best of my knowledge, in order to protect itself from competitive harm, Google takes significant precautions to ensure that this information is not made public, and does not disclose documents or information of this nature outside of the company, with

the exception of certain documents that Google shares with partners or fiduciaries, subject to further confidentiality requirements.

4.   I have reviewed the trial exhibits listed below, and I believe that the sealing (or redaction, when specified) of those exhibits is necessary to protect Google's trade secrets and proprietary information.

5.   I have reviewed RDTX67, RDTX274, RDTX433, and RDTX677, along with Google's proposed redactions. These redactions contain excerpts or derivative versions of Google's source code. Disclosure of Google's code could both allow competitors to reverse engineer Google's products for a direct and adverse competitive advantage, as well as allow buyers to unfairly game Google's products. For this reason, Google strictly maintains the confidentiality of these datasets.

6.   I have reviewed PRX005. This exhibit contains detailed descriptions of Google's proprietary algorithms and optimizations revealing Google's internal infrastructure, product design, and the flow of data through Google's systems. Public disclosure would allow competitors to recreate certain Google products, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this information.

7.   I have reviewed RDTX86, RDTX213, RDTX277, RDTX278, RDTX347, RDTX351, RDTX370, RDTX434, RDTX516, RDTX517, RDTX442, RDTX452, RDTX469, RDTX607, RDTX608, RDTX625, RDTX627, RDTX643, RDTX675, RDTX806, RDTX843, PRX019, and PRX033, along with Google's proposed redactions. These redactions contain detailed descriptions of Google's proprietary algorithms and optimizations, as well as highly technical diagrams revealing Google's internal infrastructure, product design, and the flow of data through Google's systems. Public disclosure would allow competitors to recreate certain Google products, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this information.

8.   I have reviewed RDTX197, RDTX1004, RDTX1005, RDTX1009, RDTX1015, RDTX1016, RDTX1017, RDTX1020, RDTX1022, RDTX1023, RDTX1027, and RDTX1029. These exhibits consist of highly detailed spreadsheets and raw datasets regarding Google's products and systems, including data and information concerning impressions, reservations, backfill, fees, and code structure.

3

Disclosing such granular data publicly would provide Google's competitors highly detailed information about Google's products, which could harm Google's customers as well as its competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of these datasets.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 4, 2025 in Menlo Park, CA

Signed by:
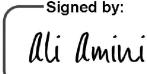
Ali Amini

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Ali Nasiri Amini